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William A. Maher
Paul R. DeFilippo

Proposed Special Litigation Counsel for the
Debtors and Debtors In Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
	:
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**SUPPLEMENTAL AFFIDAVIT OF PAUL R. DEFLIPPO
IN SUPPORT THE DEBTORS' APPLICATION
PURSUANT TO SECTIONS 327(a) AND 330
OF THE BANKRUPTCY CODE AND RULE
2014(a) OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE FOR AUTHORIZATION TO EMPLOY AND
RETAIN WOLLMUTH MAHER & DEUTSCH LLP AS SPECIAL
COUNSEL TO THE DEBTORS NUNC PRO TUNC TO SEPTEMBER 9, 2010**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

I, Paul R. DeFilippo, pursuant to 28 U.S.C. § 1746, hereby declare under the penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

1. I am an attorney duly admitted to practice before this Court. I am a member of the firm of Wollmuth Maher & Deutsch LLP ("Wollmuth" or the "Firm"), 500 Fifth Avenue,

New York, New York 10110. I am a member in good standing of the Bar of the State of New York. There are no disciplinary proceedings against me.

2. I submit this affidavit in further support of the application dated October 1, 2010 of the Debtors for entry of an order authorizing the Debtors to retain and employ the Firm as their conflicts and special litigation counsel, *nunc pro tunc* to September 9, 2010 (the “Application”) and to provide additional disclosures as required under Bankruptcy Rules 2014(a) and 2016(b).

3. I make this Affidavit based in material part on the Firm’s business records, including its conflicts database, and a review of certain business records of the Debtors, most notably the list of known defendants in the litigation for which it is proposed that the Firm represent the Debtors, all of which sources I believe to be accurate, and the response to a conflict check that was circulated through the Firm electronically. Except as otherwise noted, I have personal knowledge of the matters set forth herein.

4. The purpose of this supplemental affidavit is to provide additional disclosure regarding the Firm’s retention since the date of the Application by certain Lehman-affiliated individuals in connection with suits asserting securities law and other claims arising out of the sale of mortgage-backed securities.

5. Specifically, in April 2011, the Firm was retained by Lana Franks, Edward Grieb, Richard McKinney, Kristine Smith, James J. Sullivan, Samir Tabet and Mark L. Zusy (the “SASCO Individuals”), former officers and/or directors of Debtor Structured Asset Securities Corporation (“SASCO”), in the actions In re Lehman Brothers Mortgage-Backed Securities Litigation, No. 08-CV-6762 (LAK) and Stichting Pensioenfond ABP v. Merrill Lynch & Co., Inc., et al. No. 10-CV-6637 (LAK), both of which are venued in the District Court for the

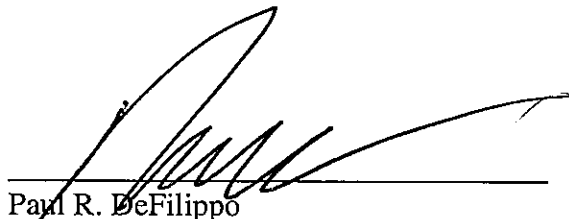
Southern District of New York and allege violations of the Securities Act of 1933 with respect to disclosure documents filed with the Securities and Exchange Commission by SASCO in connection with the sale of certain mortgage-backed securities. A recent action captioned Federal Home Loan Bank of Boston v. Ally Financial, Inc., et al., Index No. 11-1533, was filed against the SASCO Individuals and other defendants in the Superior Court of Massachusetts, Suffolk County, alleging violations of the Massachusetts Uniform Securities Act and other claims in connection with the sale of certain mortgage-backed securities. The Firm will represent the SASCO Individuals in the recently-filed action. It is anticipated that the Firm will also represent the SASCO Individuals in other actions that may be filed asserting claims arising out of the sale of mortgage-backed securities.

6. The Firm's representation of the SASCO Individuals described above is not materially adverse to the interests of the Debtors' estates and does not conflict the Firm from any matters for which the Debtors have retained, or may in the future seek to retain, the Firm.

7. The foregoing constitutes the Firm's statement pursuant to sections 327(e) of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 2016(b).

8. I certify that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Dated: May 24, 2011
New York, New York


Paul R. DeFilippo
A Member of the Firm

SWORN TO AND SUBSCRIBED
before me this 24th day of May, 2011



KYLE J. DUMAS
Notary Public, State of New York
Registration #01DU6227949
Qualified In Kings County
Commission Expires Sept. 7, 2014